



IT IS HEREBY ADJUDGED and DECREED that the below described is SO ORDERED.

Dated: March 28, 2025.


SHAD M. ROBINSON
UNITED STATES BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:	§	
	§	Chapter 11
	§	
Hot Crete, LLC	§	Case No. 24-10303
	§	
Debtor.	§	Judge Shad Robinson
	§	

**AGREED ORDER GRANTING
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

Came on for hearing before this Court the *Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. § 362 to Permit Continuation or Commencement of Litigation and Waiver of the Fourteen Day Stay Period Imposed by Rule 4001(a)* (the “Motion”) filed by James Murdock, Jessica Murdock, Brad Wheeler, Jason Nichol, Brooke Nichol, Dwayne Simmons, Gordon Reina, Paul Medeiros, Christine Medeiros, Phillip Blaine Noel, Amy Noel, Jeffrey “Jeff” Theis, Robin Theis, Michael Ladogana, Nicole Ladogana, Gilbert Lopez, Matthew Letnaunchyn, and Kimberly

Letnaunchyn (the “Movants”)¹. Based upon the record before the Court, the Court finds that the Motion should be **GRANTED** as set forth herein.

IT IS THEREFORE

ORDERED that the automatic stay of 11 U.S.C. § 362 shall remain in place unless there is an Event of Default (as defined herein). It is further

ORDERED that any of the following shall constitute an “Event of Default” under the term of this Order:

- a. Failure of the Debtor to have filed a Disclosure Statement (the “Disclosure Statement”) and a proposed Chapter 11 Plan (the “Plan”)² by April 18, 2025.
- b. Failure of the Debtor to have obtained approval of the Disclosure Statement by May 28, 2025.
- c. Failure of the Debtor to have confirmed its Plan by July 18, 2025.

If an Event of Default shall exist, then the automatic stay of 11 U.S.C. § 362 shall lift (with no further action being required by the Movants), and the Movants may proceed with state law remedies against the Debtor. If the stay lifts, the Movants shall file a notice on the docket.

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¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

² Nothing in this Order shall be deemed a waiver of any of the Movants’ rights to object to either the Disclosure Statement or the Plan.

Order submitted by:

KANE RUSSELL COLEMAN & LOGAN PC

By: /s/ Trip Nix

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Agreed to as to form and content by:

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